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EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region, InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to provide data under Qwest's "Service Order Accuracy" measure (formerly known as "OP-5++"), disaggregated to reflect (1) manually handled orders and (2) electronically handled orders.

The formula for Qwest's "Service Order Accuracy" data is patterned after the formula for OP-5, New Service Installation Quality, where the denominator is a two-month average of order volumes (inward line activity) and the numerator consists of that same number (the denominator) minus the number of calls to Qwest's centers reporting problems related to service order accuracy.

The OP-5 PID does not call for directly linking trouble reports to orders counted in the measurement. Accordingly, the "Service Order Accuracy" measure also does not make that linkage. Therefore, the counted calls to the center are also not directly linked to the orders counted in the measurement. During call handling at the center, there is no indication as to whether the call is related to a manually-processed order or a fully-electronic order. Thus, the "Service Order Accuracy" data presents an estimate of service

order accuracy based on the number of calls related to service order accuracy problems as a percentage of total OP-5-eligible orders.

It was possible to identify, out of the total number of orders counted in the denominator of the "Service Order Accuracy" measure, how many orders were manually handled or electronically handled without a special study. However, identifying the number of *calls* that were related to manually-handled versus electronically-handled orders, in order to calculate the numerator, did require a special study, which Qwest has completed. The results of this study appear below.¹

Estimate of Manual Order Accuracy									
"OP-5++" Data	September 2002 Results			August 2002 Results			July 2002 Results		
	Manual Orders			Manual Orders			Manual Orders		
STATE	NUM	DENOM	RESULT	NUM	DENOM	RESULT	NUM	DENOM	RESULT
CO	4,510	4,554	99.0%	5,070	5,101	99.4%	5,492	5,556	98.8%
IA	5,073	5,107	99.3%	5,323	5,353	99.4%	3,732	3,768	99.0%
ID	293	294	99.7%	377	380	99.2%	395	399	99.0%
MT	228	228	100.0%	330	333	99.1%	328	335	97.9%
ND	1,164	1,171	99.4%	992	1,003	98.9%	655	663	98.8%
NE	628	634	99.1%	588	592	99.3%	603	605	99.7%
UT	1,995	2,004	99.6%	1,761	1,768	99.6%	1,787	1,814	98.5%
WA	3,125	3,138	99.6%	3,119	3,131	99.6%	3,146	3,183	98.8%
WY	295	319	92.5%	280	286	97.9%	316	328	96.3%

¹ The results of the study reflect July through September data because tracking of call center data began in late June. In addition, because the denominator is a two-month average of order volumes (inward line activity), the results provided herein are necessarily estimates.

Estimate of Fully-Electronic Order Accuracy									
"OP-5++" Data	September 2002 Results			August 2002 Results			July 2002 Results		
	Electronic Orders			Electronic Orders			Electronic Orders		
STATE	NUM	DENOM	RESULT	NUM	DENOM	RESULT	NUM	DENOM	RESULT
CO	4,627	4,631	99.9%	5,239	5,244	99.9%	4,863	4,870	99.9%
IA	1,969	1,972	99.8%	2,699	2,700	100.0%	1,952	1,953	99.9%
ID	260	261	99.6%	399	401	99.5%	380	383	99.2%
MT	1,308	1,308	100.0%	1,616	1,620	99.8%	1,148	1,155	99.4%
ND	886	886	100.0%	636	636	100.0%	339	339	100.0%
NE	1,831	1,831	100.0%	1,636	1,636	100.0%	1,051	1,052	99.9%
UT	1,490	1,493	99.8%	1,135	1,136	99.9%	933	933	100.0%
WA	2,725	2,732	99.7%	3,155	3,159	99.9%	2,809	2,813	99.9%
WY	200	201	99.5%	131	131	100.0%	47	47	100.0%

The 20-page limit does not apply to this filing.

Respectfully submitted,

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